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TIMOTHY B. FLEMING  
OF COUNSEL

May 12, 2016

The Honorable Frank Maas  
United State Magistrate Judge  
UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

**Corrected:  
By ECF and facsimile**

*Re: In Re: Terrorist Attacks on September 11, 2001, 03 MDL 1570*

Dear Judge Maas:

On behalf of the *Havlish* Plaintiffs, I respectfully request an extension of time for replying to the consolidated Opposition of the Plaintiffs in the *Ashton, Federal Insurance*, and *O'Neill* cases to our pending Motion For Creation of a Common Benefit Fund. The original due date is this coming Monday, May 16, 2016. In order to accommodate litigation schedules of counsel and the Memorial Day holiday, we request that the Court grant us leave until **Friday, June 3, 2016**, to file our Reply.

This letter comprises our first request for an extension of time in regard to this motion. No other deadlines are affected. This letter is meant to supplant and replace a letter motion previously submitted today that did not completely comport with your individual practices.

The undersigned has been authorized to advise the Court that the requested extension is acceptable to counsel for the Plaintiffs in the *Ashton, Federal Insurance*, and *O'Neill* cases.

Thank you very much. .

Respectfully Submitted,



Timothy B. Fleming  
Attorney for the *Hoglan* Plaintiffs